

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NIKE, INC.,

Plaintiff,

v.

RELOADED MERCH LLC,
BILL OMAR CARRASQUILLO, and
XIAMEN WANDERING PLANET
IMPORT AND EXPORT CO., LTD.,

Defendants.

Civil Action No. 1:22-cv-10176-VM

**DEFENDANTS RELOADED MERCH
LLC AND BILL OMAR
CARRASQUILLO'S
NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, dated March 27, 2023, Defendants Reloaded Merch LLC and Bill Omar Carrasquillo, by their undersigned attorneys, will move this Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, before the Honorable Victor Marrero, on a date and at a time to be designated by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(6), dismissing Plaintiff Nike, Inc.'s Complaint dated November 11, 2022 (Doc. No. 1) and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to the Court's scheduling order dated March 1, 2023 (Doc. No. 62), answering papers, if any, must be served by April 17, 2023, and reply papers, if any, must be served by May 1, 2023.

Dated: March 27, 2023

Respectfully submitted,

s/ Robert R. Axenfeld
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